



CHARLES H. CHEVALIER
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Direct: (973) 596-4611 Fax: (973) 639-6263
cchevalier@gibbonslaw.com

March 27, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: *In re Selenious Acid Litigation*, No. 2:24-cv-07791 (BRM) (CLW) (Consolidated)
American Regent, Inc. v. Xiromed LLC, et al., No. 2:24-cv-7811 (BRM)(CLW)
American Regent, Inc. v. Xiromed LLC, et al., No. 2:24-cv-11130 (BRM)(CLW)**

Dear Judge Martinotti:

We, along with Sterne, Kessler, Goldstein & Fox P.L.L.C., counsel for Plaintiff American Regent, Inc., and Nutter McClennen & Fish LLP, counsel for Defendants Xiromed LLC and Xiromed Pharma España, S.L., LLC, jointly submit the attached Consent Judgment for the Court's consideration. If Your Honor finds this document acceptable, the parties respectfully request that Your Honor execute the document and direct its entry on the docket.

Please note that this Consent Judgment does not impact in any way the claims, counterclaims, or affirmative defenses in matters pending between Plaintiff and the other defendants¹ that were consolidated in Case No. 2:24-cv-07791.

Should the Court require anything further, the parties will make themselves available at the Court's convenience. The parties thank the Court for its time and assistance in this matter.

Respectfully submitted,

s/ Charles H. Chevalier
Charles H. Chevalier

¹ Aspiro Pharma Ltd. (C.A. Nos. 24-7794 and 24-11109), Cipla USA, Inc. and Cipla Limited (C.A. Nos. 24-7796, 24-11112), Gland Pharma Limited (C.A. Nos. 24-7802 and 24-11116), Hikma Pharmaceuticals USA Inc. (C.A. Nos. 24-7803 and 24-11118), RK Pharma, Inc. (C.A. Nos. 24-7805 and 24-11102), Sun Pharmaceutical Industries Limited and Sun Pharmaceutical Industries, Inc. (C.A. Nos. 24-7810 and 24-11126), and Zydus Pharmaceuticals (USA) Inc. (C.A. Nos. 24-7812 and 24-11133).

The Honorable Brian R. Martinotti
March 27, 2025
Page 2

Attachment

cc: All counsel of record via ECF and counsel for Defendants Xiromed LLC and Xiromed
Pharma España, S.L., LLC via ECF and e-mail